

# **Exhibit 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA  
WPC LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CASEY  
KIRSCHNER; ALLCORE DEVELOPMENT  
LLC; FINBRIT HOLDINGS LLC;  
CHESHIRE VENTURES LLC; CARLETON  
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader  
Plaintiff / Intervening  
Interpleader Counter-  
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;  
BW HOLDINGS; LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON  
DATA SERVICES, INC.,

Interpleader Defendants /  
Interpleader Counter-Plaintiffs.

**NOTICE OF DEPOSITION OF CHESHIRE VENTURES LLC  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

**PLEASE TAKE NOTICE** that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. (together, “Amazon”), by and through their counsel, will take the deposition upon oral examination of Cheshire Ventures LLC (“Cheshire Ventures”), through one or more officers, directors, managing agents, or other persons who consent to testify on its behalf with respect to the deposition topics listed in Exhibit A, attached hereto. In accordance with Rule 30(b)(6), Cheshire Ventures must designate one or more knowledgeable persons to testify regarding each of the topics listed in Exhibit A. Cheshire Ventures is directed to provide written notice at least five (5) business days before the deposition of the name(s) and employment position(s) of the person(s) designated to testify on its behalf and the topic(s) on which each such person will testify. Amazon is available to meet and confer regarding the list of deposition topics.

The deposition will take place on March 10, 2022, beginning at 9:00 a.m. CST at the offices of Burr & Forman LLP, 222 Second Avenue South, Suite 2000, Nashville, Tennessee, 37201, or at such other location as may be mutually agreed upon by counsel. The deposition will be conducted before a notary public or other officer duly authorized by law to administer oaths, and will be recorded by stenographic, audio, and videographic means.

Dated: February 15, 2022

Respectfully submitted,

/s/ Michael R. Dziuban

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 15, 2022, I will email and mail via U.S. mail the foregoing to the following parties:

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